

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK

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9384-2557 Québec Inc., a Canadian
corporation; MINEDMAP, INC., a Nevada
corporation; and SERENITY ALPHA, LLC, a
Nevada limited liability, and other similarly
situated individuals

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1:19-CV-00501-TJM-CFH

**NOTICE OF MOTION FOR LEAVE
TO AMEND COMPLAINT**

Plaintiff,

:

against

:

(ECF Case)

NORTHWAY MINING, LLC, a New York limited
liability company; MICHAEL MARANDA, an
individual; MICHAEL CARTER, an individual;
CSX4236 MOTORCYCLE SALVAGE, LLC, a New
York limited liability company; DROR SVORAI,
an individual; MINING POWER GROUP, INC., a
Florida corporation; HUDSON DATA CENTER,
INC, a New York Corporation, MICHAEL
MARANDA, LLC, a New York Limited liability
company; PORTER KING HILL CONTRACTING,
LLC, a New York limited liability company;
COINMINT, LLC, a Delaware limited liability
company; OSWEGO DATA LLC, a New York
Limited Liability Company; LORI S. THOMPSON,
LCSW, PLLC, a professional limited liability
corporation; LORI SHANNON THOMPSON, an
individual, ANTHONY PORTER, an individual;
CHRISTINE MARANDA, an individual; ROSEANN
MARANDA; an individual; DOUGLAS MARANDA,
an individual, and DONALD D'AVANZO, an
individual

:

Defendants.

:

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Pursuant to Rules 15(a)(2) of the Federal Rules of Civil Procedure and Local Rule 7.1(a)(4), Plaintiffs move to amend their Original Complaint to additional claims and additional parties. Specifically, Plaintiff moves to add a claim for aiding and abetting fraud (Count IX), a claim for accounting (Count X), and a claim for civil theft (Count XI). Plaintiffs also moves to add putative Defendants, Porter King Hill Contracting LLC, Oswego Data LLC, Lori Shannon Thompson-Maranda, Lori S. Thompson LCSW, PLLC, Anthony Porter, Christine Maranda, Douglas Maranda, and Donald D'Avanzo.

In compliance with Local Rule 7.1(b)(2), Plaintiffs state that this Court held a telephonic conference on April 20, 2020, at which the parties discussed Plaintiffs' Motion for Leave to Amend their Complaint.

Dated as of April 30, 2020.
New York, New York

RESPECTFULLY SUBMITTED,

/s/ T. Edward Williams, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April 2020, this **NOTICE OF MOTION FOR LEAVE TO AMEND PLAINTIFFS' COMPLAINT** was served on the following individuals:

John Harwick, Esq. *via ECF*
Counsel for Maranda Defendants